# **CPNI Compliance Statement of Mark Floyd**

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of customer propriety Network Information and Other Customer Information; IP-Enabled Services,* CC Docket No. 96 115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Red 6927 (2007)("EPIC CPNI Order"), | Mark Floyd, Chief executive officer of Ntegrated Consulting, LLC and affiliated entities makes the following statement:

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Mark Floyd,

Chief Executive Officer

mary lengt

# Customer Proprietary Network Information (CPNI) Accompanying Statement to Annual Certification for Ntegrated Consulting, LLC.

- A. Ntegrated Consulting, LLC. has not used CPNI except as included in 47 U.S.C.
   222(d) exceptions
- B. The status of a customer's CPNI approval is evidenced in the Company records by referring to the signed customer contract which includes the attached Privacy Policy. The customer may choose to not participate in direct marketing of new products and may request to have identifiable information deleted from the company's directory. Any correspondence regarding CPNI with the customer is also documented and kept on record. For purposes of disseminating to a third party, or for other specific uses Ntegrated Consulting LLC would obtain prior written approval via an opt-in notice giving express permission and specifically stating the CPNI information to be used and in what manner. Please see example below:

#### **Customer Proprietary Network Information**

As Ntegrated Consulting LLC provides products and services to you, we gather information about the technical configuration, quality, type, destination, and amount of products and services you use, as well as other information found on your bill ("Customer Proprietary Network Information also known as CPNI"). Under federal law, you have a right, and Ntegrated Consulting, LLC has a duty, to protect the confidentiality of your CPNI and will not disclose or sell CPNI, unless required to do so by operation of law. Ntegrated Consulting, LLC would like the express permission to use the Following information,

For the following purpose, \_\_\_\_\_\_\_Please indicate your agreement by signing below and returning this document to Ntegrated Consulting, LLC. at 1200 W Walnut Hill Ln Suite 2050 Irving, Texas 75038. If you so desire Ntegrated Consulting, LLC. to not use the information stated above please call 214-432-3600 ext 304 or simple do not respond. Your CPNI will only be used with your prior written consent. Your decision to opt-in will not have any impact on your current services. Also your decision on whether or not to opt-in is valid until you decide to change it. As such you may, at any time, opt-in or revoke your previous decision to opt-in by calling 214-432-3600 ext 304 or by written communication.

C. The Company has trained all personnel with access to CPNI as to the identification of CPNI and when CPNI may be used and has an express disciplinary process in place for any improper use of CPNI. Ntegrated Consulting, LLC. goes over these policies with every new hire and regularly holds meetings to refresh ourselves on the importance of CPNI.

- D. The Company maintains a record of all sales and marketing campaigns that use its customer CPNI.
  - I. The record is maintained by detailed documentation on any marketing/sales campaign and is overseen by a member of the executive staff.
  - 2. The record includes a description of the campaign, the CPNI used and the products and services offered.
  - 3. The record is maintained for at least one year.
- E. Any sales and marketing campaigns must be approved by management. Such campaigns are conducted under a supervisory review process to assure compliance with CPNI rules. Records evidencing compliance will be maintained for at least one year.

Mark Floyd
Chief Executive Officer

## **Privacy Policy**

Ntegrated Solutions ("Company") will not trade, sell, or disclose to any third party any form of subscriber identifiable information without the consent of the subscriber (except as required by subpoena, search warrant or other legal process or in the case where failure to disclose information will lead to imminent harm to the subscriber or others). This includes information derived from registration, subscription, and use of the Company's service.

Collection I Use of Information The Company will collect and use subscriber identifiable information for billing, provisioning of service, resolution of problems associated with service, 411 type directory services, and to inform subscribers of new products or services that will enhance the Company's ability to provide service to subscribers. The Company will use subscriber identifiable information to market products and services to the subscriber, but will not disclose or make available any subscriber identifiable information to any third parties seeking to market products. If a subscriber chooses in writing not to participate in direct marketing of new products and services from the Company then subscriber's information will not be used for the purpose of marketing new products. Additionally, the subscriber may request to have identifiable information deleted from the Company's directory.

Security The Company has invested and deployed a wide variety of technology and security features to ensure the privacy of subscriber information on its network. In addition, the Company has implemented strict operations guidelines to ensure subscriber privacy is safeguarded. The Company will continue to revise policies and implement additional security features as new technologies becomes available. However, Company cannot guarantee in any way that information provided to Company by subscriber may not be illegally obtained from Company.

Communications The Company will not read, listen to or disclose to any third parties private e-mail, conversations, or other communications that are transmitted using the Company services, except as required to ensure proper operation of services or as otherwise authorized by law.

Unlawful Activity the Company may use subscriber identifiable information to investigate and help prevent potentially unlawful activity or activities that threaten the integrity of service, the network integrity, that otherwise violate the

Company's Service Agreements or activities that are or may be illegal.

Account Information The subscriber is responsible for ensuring that the information on file with the Company is current and accurate.

Information provided by you to the Company shall not be shared to any third parties for commercial use.

Children's Privacy Policy the Company does not sell products or services for purchase or use by children. The Company does not

Knowingly solicit or collect subscriber identifiable information from children or teenagers under the age of Eighteen. In addition, the Company will not knowingly link to any third party web site that solicits or collects Subscriber identifiable information from minors. If you believe that a minor has disclosed personally identifiable information to the Company, please contact the Company at support@ntcp.net so that the information Can be removed

## Right to Modify

The Company reserves the right to modify its Privacy Policy at any time. In the event that we make a material change to our policy we will post a notice of the change on this page.